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7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**

10 **PROJECT SENTINEL, individually**  
and on behalf of the GENERAL  
11 PUBLIC,

Lead Case No. C-04-03792 MJJ

12 Plaintiff,

Consolidated with:

13 vs.

14 **RUTH BRIONES, et al.,**

15 **Defendants.**

16 **VICTOR NEWMAN, individually and**  
on behalf of the GENERAL PUBLIC,

Case No. C-04-03793 MJJ

17 Plaintiff,

JOINT APPLICATION AND  
STIPULATION TO MODIFY  
PROTECTIVE ORDER; ~~PROPOSED~~  
ORDER

18 vs.

19 **RUTH BRIONES, et al.,**

20 **Defendants.**

22 On July 6, 2005, Magistrate Judge Bernard Zimmerman issued an order granting  
23 in part plaintiff Project Sentinel's motion to compel net worth discovery. Magistrate  
24 Judge Zimmerman's order compelling further discovery directed the disclosure of that  
25 net worth information pursuant to an "appropriate protective order."

26 This joint application and stipulation seeks to modify the protective order already  
27 issued in this case by designating defendants' net worth information as confidential.

28  
**JOINT APPLICATION AND STIPULATION TO MODIFY PROTECTIVE ORDER); ~~PROPOSED~~ ORDER**  
**- LEAD CASE NO. C-04-03792 MJJ**

1 A modified protective order, approved by the parties, is attached hereto.

2 So stipulated.

3 Respectfully submitted,

4 BRANCART & BRANCART

5 Dated: Aug 4, 2005

6   
7 Liza Cristol-Deman  
8 Attorney for Plaintiff Project Sentinel

9 COLE & FASANO

10 Dated: July \_\_\_, 2005

11 See attached  
12 Rufus L. Cole  
13 Attorney for Plaintiff Victor Newman

14 MCNAMARA, DODGE, NEY, BEATTY,  
15 SLATTERY & PFALZER LLP

16 Dated: July \_\_\_, 2005

17 See attached  
18 Noah G. Blechman  
19 Attorney for All Defendants

1 A modified protective order, approved by the parties, is attached hereto.  
2 So stipulated.

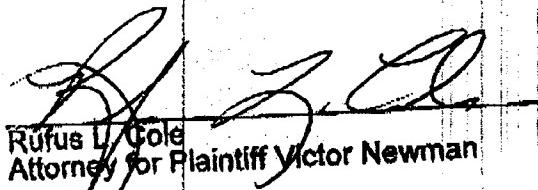
3  
4 Respectfully submitted,  
5  
6 BRANCART & BRANCART

7  
8 Dated: July \_\_\_, 2005  
9

10 Liza Cristol-Deman  
11 Attorney for Plaintiff Project Sentinel  
12

13 COLE & FASANO  
14

15 Aug  
16 Dated: July 3, 2005  
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19 Rufus L. Cole  
20 Attorney for Plaintiff Victor Newman  
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22 MCNAMARA, DODGE, NEY, BEATTY,  
23 SLATTERY & PFALZER LLP  
24

25 Dated: July \_\_\_, 2005  
26

27 Noah G. Blechman  
28 Attorney for All Defendants  
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JOINT APPLICATION AND STIPULATION TO MODIFY PROTECTIVE ORDER) [PROPOSED] ORDER  
- LEAD CASE NO. C-04-03782 MJJ  
2a

1 A modified protective order, approved by the parties, is attached hereto.

2 So stipulated.

3 Respectfully submitted,

4  
5 BRANCART & BRANCART

6 Dated: July \_\_\_, 2005

7 Liza Cristol-Deman  
8 Attorney for Plaintiff Project Sentinel

9  
10 COLE & FASANO

11 Dated: July \_\_\_, 2005

12 Rufus L. Cole  
13 Attorney for Plaintiff Victor Newman

14 MCNAMARA, DODGE, NEY, BEATTY,  
15 SLATTERY & PFAZER LLP

16 August  
17 Dated: July 4, 2005

18 Noah G. Blechman  
19 Attorney for All Defendants

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JOINT APPLICATION AND STIPULATION TO MODIFY PROTECTIVE ORDER; [PROPOSED] ORDER  
- LEAD CASE NO. C-04-03792 MJJ

## **MODIFIED PROTECTIVE ORDER**

**IT IS HEREBY ORDERED THAT:**

1. The Protective Order issued by the Court on January 28, 2005 is hereby modified to designate the following information as "Confidential Information":

5 (a) Defendants' net worth.

6       2. The Confidential Information described above is properly subject to  
7 protection under Rule 26(c) of the Federal Rules of Civil Procedure and Magistrat  
8 Judge Bernard Zimmerman's order compelling further discovery, dated July 6, 20

9       3. All other terms and provisions of the Court's previously issued Protective  
10 Order apply to this Confidential Information. However, the net worth information  
11 protected under the terms of this modification shall be for attorneys' eyes only. Such  
12 confidential net worth information shall not be disclosed or communicated to anyone,  
13 orally or in writing, other than counsel for plaintiffs, and shall not be disclosed to  
14 plaintiffs themselves or third-parties at any time.

IT IS SO ORDERED.

DATED: 8/10, 2005.



1 ATTACHMENT 1

2 NON-DISCLOSURE AGREEMENT

3 I, \_\_\_\_\_, do solemnly swear that I am fully familiar  
4 with the terms of the stipulated protective order entered in Project Sentinel and Victor  
5 Newman v. Ruth Briones et al., United States District Court, Northern District of California,  
6 Lead Case Number C-04-3792 MJJ, and hereby agree to comply with and be bound by the  
7 terms and conditions of this order unless and until modified by further order of this Court.  
8 I hereby consent to the jurisdiction of this Court for the purpose of enforcing this order.

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10 Dated: \_\_\_\_\_.

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13 Signature  
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